

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>BRYAN MERCER, CANDACE McKINLEY, SHANEE GARNER-NELSON, ADAM BUTLER,</p> <p style="text-align: center;">Plaintiffs, v. KEVIN JACKSON, THE BLACK SPHERE, LLC, and various JOHN DOES,</p> <p style="text-align: center;">Defendants.</p>	<p>CIVIL ACTION  Case No. 2:20-cv-00098-ER</p>
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**DEFENDANTS KEVIN JACKSON AND THE BLACK SPHERE, LLC'S  
MOTION TO DISMISS THE AMENDED COMPLAINT**

Defendants Kevin Jackson and The Black Sphere, LLC, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and through their undersigned counsel, hereby move to dismiss the Amended Complaint. Defendants rely upon the attached Memorandum of law.

Respectfully submitted,

/s/ Martin C. Bryce, Jr.

Martin C. Bryce, Jr.

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Black Sphere, LLC*

Dated: August 26, 2020

**CERTIFICATION**

The undersigned attests that he verbally discussed the subject matter of the instant motion, as required by the Court's procedures, with Plaintiffs' counsel, and the parties have been unable to reach a resolution of the issues.<sup>1</sup>

*/s/ Martin C. Bryce, Jr.*

Martin C. Bryce, Jr.

Dated: August 26, 2020

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<sup>1</sup> Defendants had also reserved the right to move to dismiss after review of Plaintiffs' Motion to Amend [Dkt. #15]. See Defendants' Response to Plaintiffs' Motion for Leave to File Amended Complaint [Dkt. #16].